

Van W. Northern
Northern Legal, PC
2700 S Western St, Suite 200
Amarillo, Texas 79109
SBN: 15101100
(806) 374-2266, (806) 374-9535 FAX
ATTORNEY FOR SHANNON SUE BALDWIN

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	Case No. 19-20225-RLJ
	§	
Shannon Sue Baldwin,	§	Chapter 7
	§	
Debtor.	§	Hearing Date: November 14, 2019
	§	Time: 1:30 p.m.

**DEBTOR'S RESPONSE TO BMO HARRIS BANK N.A.'S AMENDED MOTION
FOR RELIEF FROM AUTOMATIC STAY OR IN THE ALTERNATIVE
ADEQUATE PROTECTION PAYMENTS REGARDING THE 2010 CASCADIA
FRONTLINER AND THE 2011 CASCADIA FREIGHTLINER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Debtor Shannon Sue Baldwin (hereafter "Debtor"), and in response to the Amended Motion for relief from Automatic Stay or in the Alternative Adequate Protection Payments regarding the 2010 Cascadia Frontliner and the 2011 Cascadia Freightliner by BMO Harris Bank N.A. (hereafter "Movant"), would show the court as follows:

1. Admit only to the extent accurately reflected in the exhibit attached to the Motion of Movant.
2. Admit only to the extent accurately reflected in the exhibit attached to the Motion of Movant.
3. Admit only to the extent accurately reflected in the exhibit attached to the Motion of Movant.
1. Admit only to the extent accurately reflected in the exhibit attached to the Motion of Movant.
2. Admit.
3. Admit only to the extent accurately reflected in the exhibit attached to the Motion of Movant.
4. Admit only to the extent accurately reflected in Movant's filed Claims.

5. Admit. However, Debtor agrees to be current or pay adequate protection of \$1,500.00 per month until the Note is paid in full, or collateral sold and Note paid in full.
6. Deny. See response to paragraph 5 above.
7. Deny. See response to paragraph 5 above.
8. Deny. See response to paragraph 5 above.

WHEREFORE, PREMISES CONSIDERED, Debtor prays for such other relief at law and equity.

Respectfully submitted,

NORTHERN LEGAL, PC
2700 S. Western St, Suite 200
Amarillo, Texas 79109
Tel. (806) 374-2266
Fax. (806) 374-9535

/s/Van W. Northern
Van W. Northern
State Bar No. 15101100
Attorney for Debtor

CERTIFICATE OF SERVICE

The undersigned certifies that he has transmitted a true copy of the foregoing instrument to the following parties in interest by electronic filing or regular U.S. mail on the 22nd day of October, 2019:

Kent David Ries
2700 S Western St.
Suite 300
Amarillo, TX 79109
Chapter 7 Trustee

U.S. Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-1496

Ammar Dababhoy
Wong Fleming
77 Sugar Creek Center Blvd, Suite 401
Sugar Land, TX 77478
Attorney for Movant

Shannan Baldwin
7600 E. Interstate 40
Amarillo, TX 79118

/s/Van W. Northern
Van W. Northern